

HONORABLE BARBARA J. ROTHSTEIN  
HONORABLE S. KATE VAUGHAN

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MATT WRIGHT;

Plaintiff,

vs.

STATE OF WASHINGTON, WASHINGTON  
STATE DEPARTMENT OF CORRECTIONS,  
CHRISTINE GOMES, TRACI DRAKE, DAVID  
CHRISTENSEN, CAROL SMITH, LOUISE  
STEMLER, JASON MARTIN, JASON RICHER,  
ALEX COSTA, RISA KLEMME, NIKKI RYMER,  
and DOES I-X inclusive,

Defendants.

NO. C23-1326-BJR-SKV

**AGREED STIPULATION AND  
(PROPOSED) ORDER  
EXTENDING CASE SCHEDULE  
DEADLINES**

**Noted for Consideration:**

**January 12, 2024**

**I. STIPULATION**

For good cause shown and pursuant to the Court's Scheduling Order (ECF 8), all parties to this matter stipulate as follows:

1. The parties have been actively engaged in discovery in this matter, including exchange of written interrogatories and request for production. The parties intend to engage in depositions of fact witnesses and parties.

2. The current expert discovery deadline is March 20, 2024. Due to the breadth of discovery sought and the need for reviewing and redacting records sought by the parties, the parties will

**AGREED STIPULATION AND (PROPOSED)  
ORDER EXTENDING CASE SCHEDULE  
DEADLINES  
NO. C23-1326-BJR-SKV – 1**

*LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.  
ATTORNEYS AT LAW  
2674 R.W. JOHNSON RD. TUMWATER, WA 98512  
P.O. BOX 11880 OLYMPIA, WASHINGTON 98508-1880  
(360) 754-3480 FAX: (360) 357-3511*

1 need additional time to complete discovery. The parties anticipate that an additional six (6) months  
 2 from the current deadline will suffice.

3 3. Extending the discovery deadline will make it difficult to maintain the remaining dates on  
 4 the case schedule order, including disclosure of expert testimony, expert related motions and dispositive  
 5 motions, as well the ability to evaluate the case for potential pretrial mediation. Therefore, the parties  
 6 request that all remaining dates on the case schedule also be extended as follows:  
 7

8 EVENT	CURRENT DEADLINE	NEW DEADLINE
9 Expert Disclosures	January 19, 2024	July 19, 2024
10 Rebuttal Expert Disclosures	February 16, 2024	August 16, 2024
11 Discovery Motions	February 26, 2024	August 26, 2024
12 Discovery Deadline	March 20, 2024	September 20, 2024
13 Dispositive Motions	April 19, 2024	October 21, 2024
14 Motions in Limine	August 12, 2024	February 12, 2025
15 Joint Pretrial Statement	August 19, 2024	February 19, 2025
16 Jury Trial	September 16, 2024	March 17, 2025

17  
 18  
 19 STIPULATED TO THIS 12<sup>th</sup> DAY OF January 2024.

20 LAW, LYMAN, DANIEL, KAMERRER  
 & BOGDANOVICH, P.S.

21 /s/ Matthew Sonneby

22 /s/ John E. Justice

23 Matthew Sonneby, WSBA No. 60123  
 24 John E. Justice, WSBA No. 23042  
 25 Attorney for Defendants  
 26 P.O. Box 11880, Olympia, WA 98508  
 Phone: (360) 754-3480 Fax: 360-754-3480  
[msonneby@lldkb.com](mailto:msonneby@lldkb.com); [jjustice@lldkb.com](mailto:jjustice@lldkb.com)

**AGREED STIPULATION AND ~~(PROPOSED)~~  
 ORDER EXTENDING CASE SCHEDULE  
 DEADLINES  
 NO. C23-1326-BJR-SKV – 2**

LAW, LYMAN, DANIEL,  
 KAMERRER & BOGDANOVICH, P.S.  
 ATTORNEYS AT LAW  
 2674 R.W. JOHNSON RD. TUMWATER, WA 98512  
 P.O. BOX 11880 OLYMPIA, WASHINGTON 98508-1880  
 (360) 754-3480 FAX: (360) 357-3511

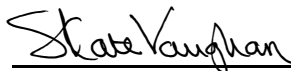
/s/ Darryl Parker (per email authorization)  
Darryl Parker, WSBA No. 30770  
Attorney for Plaintiff  
CIVIL RIGHTS JUSTICE CENTER PLLC  
1833 N 105th Street, Suite 201  
Seattle, WA 98133  
[dparker@civilrightsjusticecenter.com](mailto:dparker@civilrightsjusticecenter.com)

**~~PROPOSED~~ ORDER**

Pursuant to the stipulation of the parties, and for good cause shown, the Case Schedule Order is modified as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Expert Disclosures	January 19, 2024	July 19, 2024
Rebuttal Expert Disclosures	February 16, 2024	August 16, 2024
Discovery Motions	February 26, 2024	August 26, 2024
Discovery Deadline	March 20, 2024	September 18, 2024
Dispositive Motions	April 19, 2024	October 18, 2024
Motions in Limine	August 12, 2024	February 5, 2025
Joint Pretrial Statement	August 19, 2024	February 18, 2025
Pretrial Conference	September 3, 2024 at 10:30am	March 4, 2025 at 10:30am
Jury Trial	September 16, 2024	March 17, 2025

DONE THIS 22nd DAY OF January, 2024



S. KATE VAUGHAN  
United States Magistrate Judge

**AGREED STIPULATION AND ~~(PROPOSED)~~  
ORDER EXTENDING CASE SCHEDULE  
DEADLINES  
NO. C23-1326-BJR-SKV – 3**

LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.  
ATTORNEYS AT LAW  
2674 R.W. JOHNSON RD. TUMWATER, WA 98512  
P.O. BOX 11880 OLYMPIA, WASHINGTON 98508-1880  
(360) 754-3480 FAX: (360) 357-3511

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify under penalty of perjury under the laws of the United States of America that on this date, I caused to be electronically filed the foregoing document, and this Certificate of Filing & Service with the CM/ECF e-filing portal which will cause the same to be served on the following:

**Plaintiffs Attorney:**

Darryl Parker  
CIVIL RIGHTS JUSTICE CENTER PLLC  
1833 N 105th Street, Suite 201  
Seattle, WA 98133  
[dparker@civilrightsjusticecenter.com](mailto:dparker@civilrightsjusticecenter.com)

DATED this 12<sup>th</sup> day of January, 2024 at Tumwater, WA.

*/s/ Lisa Gates*

\_\_\_\_\_  
Lisa Gates, Legal Assistant